

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

-v.-

ELIZABETH ANN PIERCE,

Defendant.

INFORMATION

18 Cr. \_\_\_\_\_

18 CRIM 388

JUDGE RAMOS

COUNT ONE

(Wire Fraud)

The United States Attorney charges:

1. From at least in or about May 2015, up to and including at least in or about July 2017, in the Southern District of New York and elsewhere, ELIZABETH ANN PIERCE, the defendant, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, willfully and knowingly did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds, for the purpose of executing such scheme and artifice, to wit, in order fraudulently to induce investors to invest over \$250 million in the Alaska-based high-speed fiber optic company of which she was the chief executive officer, PIERCE forged counterparties'

signatures on approximately five contracts for the sale of broadband capacity and related documents, which she sent, or caused to be sent, by fax or over the Internet from Anchorage, Alaska, to Manhattan, New York.

(Title 18, United States Code, Sections 1343 and 2.)

### **FORFEITURE ALLEGATION**

2. As a result of committing the offense alleged in Count One of this Information, ELIZABETH ANN PIERCE, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28 United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

### **Substitute Assets Provision**

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;

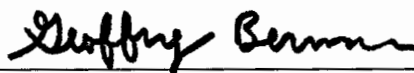
c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981;  
Title 21, United States Code, Section 853; and  
Title 28, United States Code, Section 2461.)



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GEOFFREY S. BERMAN  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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**INFORMATION**

18 Cr. \_\_\_\_\_ (ER)

(18 U.S.C. §§ 1343 and 2)

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GEOFFREY S. BERMAN  
United States Attorney.

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